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7

8 **UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,)	Case No. 2:21-cr-00113-APG-EJY
)	
11 Plaintiff,)	STIPULATION TO CONTINUE
)	SENTENCING HEARING
12 vs.)	
)	(FirstRequest)
13 TOMMY GHOLSON,)	
)	
14 Defendant.)	
)	

16 IT IS HEREBY STIPULATED AND AGREED by and between, Jason Frierson,
17 United States Attorney, District of Nevada, K. Nicholas Portz, Special Assistant United States
18 Attorney ("SAUSA") representing the United States of America, and Rene L. Valladares,
19 Federal Public Defender, and Benjamin Nemec, Esq., representing Defendant Tommy Gholson,
20 that the Sentencing Hearing currently scheduled for January 10, 2023, in the above captioned
21 matter, be vacated and continued for no less than two weeks to a date and time to be set by this
22 Honorable Court.

23 This stipulation is entered into for the following reasons:

24 1. The undersigned counsel for government's SAUSA position concludes on January

1 9, 2023. At that time, this case will be reassigned to another attorney for the government who
2 will require additional time to become familiar with the case in order to file the appropriate
3 memoranda prior to sentencing as well as to prepare for argument at sentencing. Undersigned
4 counsel has discussed the scheduling conflict with defense counsel and the parties have agreed
5 to a short continuance to provide appropriate time for new government counsel to prepare for
6 sentencing.

7 2. Defendant is out of custody and does not object to continuing the sentencing
8 hearing.

9 3. The parties agree to the continuance.

10 This is the first request for a continuance of the sentencing hearing.

11 DATED this 29th day of November 2022.

12
13 JASON M. FRIERSON
14 United States Attorney

15 /s/ K. Nicholas Portz
16 K. NICHOLAS PORTZ
17 Special Assistant United States Attorney

/s/ Benjamin Nemec
BENJAMIN NEMEC
Assistant Federal Public Defender

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,) Case No. 2:21-cr-00113-APG-EJY
4)
5 Plaintiff,)
6)
7 vs.)
8)
9 TOMMY GHOLSON,) **ORDER**
10)
11 Defendant.)
12)
13)
14)
15)
16)
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23)
24)

IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for January 10, 2023, be vacated, and continued to January 31, 2023 at 1:30 p.m. in Las Vegas Courtroom 6C.

DATED this 30th day of November, 2022.



HONORABLE ANDREW P. GORDON
UNITED STATES DISTRICT COURT JUDGE